

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JOSEPH CARTAGENA,**

*Plaintiff,*

v.

**TERRANCE DIXON, TYRONE  
BLACKBURN, and T.A.  
BLACKBURN LAW, PLLC,**

*Defendants.*

Civil Action No. \_\_\_\_\_

**JURY TRIAL DEMANDED**

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**PLAINTIFF JOSEPH CARTAGENA'S  
COMPLAINT AND DEMAND FOR JURY TRIAL**

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Joseph Tacopina  
Chad Seigel  
**Tacopina Seigel & DeOreo**  
275 Madison Avenue, 35<sup>th</sup> Floor  
New York, New York 10016  
jtacopina@tacopinalaw.com  
cseigel@tacopinalaw.com  
212-227-8877

**Of Counsel:**

Jordan W. Siev  
**Reed Smith LLP**  
599 Lexington, 22<sup>nd</sup> Floor  
New York, New York 10022  
jsiev@reedsmith.com  
212-205-6085

*Attorneys for Plaintiff  
Joseph Cartagena*

Plaintiff Joseph Cartagena, as and for his Complaint against Defendants Terrance Dixon, Tyrone Blackburn and T.A. Blackburn Law, PLLC, hereby alleges as follows:

**Introduction**

1. Plaintiff Joseph Cartagena, who is professionally known as “Fat Joe,” is a world-renowned musician, entrepreneur, and philanthropist. For approximately a dozen years, and ending nearly 6 years ago, Defendant Terrance Dixon, who is professionally known as “TA,” worked with Cartagena as a hype man — a supporting performer who increases audience engagement with interjections and chants. Cartagena compensated Dixon handsomely for his role, and Dixon never complained or expressed any dissatisfaction with his pay or other conditions of his work. Nor could he.

2. Cartagena began working with Dixon in approximately 2006. Dixon eagerly accepted the once-in-a-lifetime opportunity to be a part of Cartagena’s team. He also accepted the generous compensation Cartagena paid him. And throughout their relationship, Dixon enjoyed the perquisites of touring, luxurious travel, and other fringe benefits of being part of a world-renowned musician’s team. The relationship ended amicably in 2019, and Dixon never raised any issues or sought any additional compensation over these past 6 years.

3. Then something changed. In an obvious money grab, all these years later, Dixon claims that he should have been paid more. He claims (falsely) that Cartagena recently blocked him from getting outside funding for a record label, which was the “last straw” that caused him to dredge up decades old, supposed grievances and issues, none of which were aired contemporaneously and – more importantly – none of which are true.

4. Thus, instead of speaking to Cartagena about his *post-hoc* grievances, Dixon made countless posts on social media containing a torrent of wholly fabricated, grotesque, and scandalous allegations — accusing Cartagena of unspeakable acts such as pedophilia, statutory

rape, and sexual assault. For example, Dixon published shocking falsehoods on Instagram, including that Cartagena: (a) “WAS DATING AND HAVING SEX WITH A 16 YEAR OLD GIRL;” (b) flew an “underage” girl “across state lines and out the country;” (c) “HAD A FULL FLEDGE RELATIONSHIP WITH NIKKI WHO WAS UNDERAGE;” and (d) “DOES @marketamerica KNOWS [SIC] THEY HAVE A PEDOPHILE AS THEY SPOKE’S PERSON[?].”

5. Dixon knew that his abhorrent statements about Cartagena were false when he made them. He nonetheless wielded these statements as weapons in a calculated campaign to shatter Cartagena’s reputation and extort him into surrendering to Dixon’s outrageous financial demands.

6. Dixon calculated incorrectly. Cartagena is steadfast and resolute: the allegations are false, and Cartagena will *never* succumb to Dixon’s repugnant tactics.

7. But Dixon was not done. Frustrated by Cartagena’s fortitude, Dixon hired Defendant Tyrone Blackburn who, in the words of the Honorable Judge Denise Cote of this Court, “improperly files cases in federal court to garner media attention, embarrass defendants with salacious allegations, and pressure defendants to settle quickly.” *Zunzurovski v. Fisher*, No. 23-cv-10881, 2024 U.S. Dist. LEXIS 62568, at \*14 (S.D.N.Y. Apr. 3, 2024) (attached as Exhibit “A” hereto). And just a few months ago, the Honorable J. Paul Oetken of this Court issued a “warning to” Blackburn, because his “filings are replete with inaccurate statements of law” and “full of similar irrelevant insults, misstatements, and exaggerations.” *Jones v. Combs*, No. 24-cv-1457, 2025 U.S. Dist. LEXIS 54277, at \*10 (S.D.N.Y. Mar. 24, 2025) (attached as Exhibit “B” hereto). Judge Oetken was flabbergasted by Blackburn’s misconduct and stated: “That any licensed

member of the bar would espouse such an absurd understanding of the law is not just disturbing, but shocking.” *Id.*

8. Dixon and Blackburn started with a written demand on March 23, 2025 for compensation as a “ghostwriter and uncredited vocalist” on certain of Cartagena’s songs. When this absurd and false claim did not garner the response that the Defendants desired — namely an unwarranted payout from Cartagena — they sunk to much lower depths.

9. By letter dated April 21, 2025, which attached an intended complaint against Cartagena, Dixon and Blackburn threatened to file that complaint not just for unpaid wages and other compensation, but also — and with utter disregard for truth or decency — false and outrageous allegations against Cartagena that have absolutely nothing to do with Dixon’s purported unpaid wages, including unspeakable acts such as statutory rape, forced labor, sex trafficking, and fraud. To the contrary, Dixon and Blackburn’s allegations concern third parties that Blackburn admitted are not his clients. These monstrous accusations — notably lacking from the March 2025 demand letter — are conjured from thin air and, once again, designed to extort Cartagena to pay Dixon’s and Blackburn’s outrageous financial demands.

10. Blackburn also made false statements during calls with Cartagena’s counsel that he personally verified all allegations and had spoken with critical witnesses, including one of the alleged minors, who have denied speaking to Blackburn.

11. Blackburn continued to threaten Cartagena on a daily basis with many evening and late night/early morning email messages to his counsel, stating things like “we will report him to Homeland Security” (8:57 p.m. email on April 22, 2025); “playtime is over” (12:15 a.m. email on April 29, 2025); the “case has just expanded into a Civil RICO case” (7:27 p.m. email on April 28, 2025); and that he was adding Cartagena’s marketing partner to the complaint for aiding and

abetting (9:52 p.m. email on April 26, 2025). The threats, however, have failed to achieve their goal.

12. Dixon's and Blackburn's conduct is thus a cold-blooded attempt to extort exorbitant sums from Cartagena by leveraging the specter of public disgrace and professional ruin. His defamatory statements accusing Cartagena of heinous crimes are devoid of any factual foundation, relying instead on the power of shock, scandal and Cartagena's high-profile status to maximize leverage. And Blackburn's threats to publish false allegations against Cartagena under the cloak of the judicial system are shakedown tactics masquerading as lawyering, and are entirely consistent with Judge Cote's statement above. Cartagena thus brings this lawsuit in the pursuit of justice and to shut down Dixon's and Blackburn's predatory plot, built entirely on lies, to destroy Cartagena's reputation and business for profit.

### **Parties**

13. Plaintiff Joseph Cartagena, known professionally as "Fat Joe," is an individual and citizen and resident of the State of Florida.

14. Defendant Terrance Dixon, known professionally as "TA," is an individual and citizen and resident of the State of New York.

15. Defendant Tyrone Blackburn is an attorney and resident of the State of New York. He is the principal of his eponymous law firm, Defendant T.A. Blackburn Law, PLLC. Blackburn's conduct described in this Complaint were taken on behalf of himself, individually, and on behalf of Defendant T.A. Blackburn Law, PLLC.

16. Defendant T.A. Blackburn Law, PLLC ("Blackburn Law") is a law firm organized under the laws of the State of New York and operates its principal place of business from Brooklyn, New York.

### **Jurisdiction and Venue**

17. This Court has subject matter jurisdiction under 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States. Cartagena is a citizen of the State of Florida. Dixon, Blackburn and Blackburn Law are citizens of the State of New York. Upon information and belief, no member of Blackburn Law resides in or is a citizen of the State of Florida.

18. This Court has personal jurisdiction over Dixon, Blackburn and Blackburn Law because they are citizens of and reside in the State of New York.

19. Venue in this district is appropriate under 28 U.S.C § 1391 because Dixon resides in this judicial district, and a substantial part of the events or omissions giving rise to the claim herein occurred in this judicial district.

### **Factual Background**

#### **I. Cartagena Is A World-Renowned Musician, Producer, Actor, Entrepreneur and Philanthropist**

20. Cartagena is a native of the Bronx, New York. His music career began in the early 1990s and has spanned decades. He is known as one of the most influential figures in the rap industry. Cartagena has released eleven studio albums and five collaborative albums to much critical acclaim. He has sold over 1.5 million albums. He has won Billboard Latin Music Awards' Latin Dance Club Play Track of the Year and has been nominated for five Grammy Awards.

21. Cartagena is also a successful entrepreneur. He co-founded the clothing store "FJ560," launched his own sneaker line, "FJ560," and invested in "Rewind it 10" and "Up NYC." Cartagena also has countless endorsement deals, which rely on his pristine image.

22. Cartagena is a philanthropist. His many philanthropic endeavors include, in January 2022, helping to organize a day-long fundraiser for families who were impacted by a tragic apartment fire at the Twin Parks North West apartments in the Bronx.

23. In late September 2023, Cartagena visited the Eagle Academy for Young Men in the Bronx and gifted unknowing students over \$100,000 in brand-new clothing to start the school year.

24. Cartagena frequently arranges speaking engagements at public schools and with politicians to promote a wide array of community-forward initiatives, including educational advancement in low-income areas and public health awareness.

25. Cartagena has received numerous civic awards, including the Key to New York City and an honorary doctorate from Lehman College. He has a place on the Bronx Walk of Fame.

26. Cartagena's biography with the Bronx Walk of Fame states that "[h]is contributions to the genre, his entrepreneurial pursuits, and his dedication to philanthropy have made him a respected figure in both the music industry and the wider community."

## **II. After Years of Working Together, Dixon Fabricates Claims That Cartagena Engaged In Unspeakable Acts, Including Pedophilia and Rape**

27. At various times from approximately 2006 to 2019, Dixon acted as a "hype man" for Cartagena, assisting him on tours and concerts. In exchange for these services, Cartagena compensated Dixon handsomely.

28. For years, their arrangement worked well and without issue. Some 4 years later, however, Dixon — in a blatant money grab — began to attack Cartagena in order to attempt to monetize Cartagena's fame and good reputation for his own benefit.

29. In 2023, Dixon initiated a campaign of public harassment against Cartagena by making and publishing countless defamatory and false statements on his public social media

accounts, including his Instagram account, @thatstrategy. This pattern of conduct is unfortunately par for the course for Dixon – he has repeatedly told even members of his family that if they did not stop working with Cartagena, he would put false information about Cartagena out on social media, and would “take all of Joe’s money.”

#### **A. Dixon Falsely Accuses Cartagena of Sexual Assault**

30. In June 2010, Cartagena performed in Wisconsin. Following a show, a fan made allegations of “inappropriate touching.” Within hours, Cartagena was cleared of any wrongdoing. As explained by his attorney: “Fat Joe had no contact with, and never spoke to his accuser. He was questioned for a few minutes at his hotel room and was never detained by the police.”

31. For his part, Dixon never complained to Cartagena (or, upon information and belief, to anyone else) about the supposedly horrific acts that he witnessed. In fact, the “inappropriate touching” allegation was made against Dixon, not Cartagena. Nevertheless, and knowing that his statements were false, on June 17, 2023, Dixon posted a screenshot of a 2010 CNN news article to his Instagram account, entitled, “Rapper Fat Joe questioned about sex assault complaint [in Wisconsin].” Dixon’s post featured a picture of Cartagena with the following caption: “@FATJOE THIS RAPE CHARGE WAS ON YOU I KNOW THE STORY AND I WILL GO INTO FULL DETAIL:” Exhibit C.

32. Dixon again accused Cartagena of rape later that day, posting: “@FATJOE MILWAUKEE WAS SCARY AND IT WAS YOUR FAULT SHOULD I GO INTO DETAIL???” Exhibit D.

33. In October 2023, Dixon sent a series of extortionate WhatsApp messages to Cartagena’s manager (“Manager”). Dixon sent Manager a fake picture of a news headline — “FAT JOE STATUTORY RAPE VICTIM REVEALED.”



34. Dixon threatened:

This is what the news paper is going to look like wow is daughter is going to be real proud of him I'm going to tag Jordan Nike cnn the wthite the president and the vice president every major outlet will have this now think about it this just one.

Exhibit E.

35. On the same day, Dixon ominously warned: "The count down is on[.] Tell the fat man be smart I warned him before" and that "Joe got it fucked up I get it joe didn't get it yet I'm the predator joes the prey." Exhibit F.

36. Dixon doubled down on his false allegations of sexual assault in a December 2024 YouTube interview in which he falsely accused Cartagena of sexually assaulting a woman in Wisconsin by placing his hand up her skirt. Exhibit G.

37. Dixon knew that these statements were false: Cartagena never sexually assaulted anyone. Authorities never charged or detained Cartagena in connection with the allegations in Wisconsin and cleared him of any involvement shortly after speaking with him. Rather, Dixon attempted to resurrect a decade plus-old false accusation and headline to support his campaign of harassment and extortion.

#### **B. Dixon Outrageously Accuses Cartagena of Statutory Rape**

38. Dixon's statements escalated later in 2023. Desperate to harm Cartagena, Dixon accused him of being a pedophile. These allegations were again false, which Dixon *knew* when he made them.

39. On August 31, 2023, for example, Dixon posted about Cartagena, whom Dixon occasionally calls "Lil Joey," stating "lil joey doing his pedophile dance when he bags another 16 year old." Exhibit H.

40. Similarly, on September 9, 2023, Dixon posted another picture and stated: “LIL JOEY CAP DOING HIS PEDOPHILE DANCE HE’S DIVING LOOKING FOR LITTLE GIRLS 🍑.” Exhibit I.

41. On September 13, 2023, Dixon posted: “@FATJOE YOU ASK ME DO I TAKE ANY ACCOUNTABILITY YES I DO FOR WATCHING YOU MESS WITH UNDER AGE GIRLS BUT I WAS MINDING MY BUSINESS,” “STOP MOVING AROUND IN THE STREETS LIKE YOU WASN’T MESSING WITH A UNDER AGE GIRL” and “YOU’RE A PEDOPHILE.” Exhibit J.

42. Dixon further attempted to tarnish Cartagena’s professional reputation and connections by explicitly tagging Cartagena’s business connections in his defamatory posts. For example, Cartagena is the President of Urban and Latino Development of Market America, a product brokerage and internet marketing company. On December 6, 2023, Dixon posted about Cartagena, tagging Market America’s Instagram account and writing: “DOES @marketamerica KNOWS THEY HAVE A PEDOPHILE AS THEY SPOKE’S PERSON.” Exhibit K.

43. Dixon’s abhorrent, defamatory conduct continued throughout 2024:

- a. **May 23, 2024.** Dixon posted about Cartagena, stating: “LIL JOEY WAS DATING AND HAVING SEX WITH A 16 YEAR OLD GIRL NAMED NIKKI AKA CHIQUITA HE HAD A FULL FLEDGE RELATIONSHIP WITH HER FOR 5 YEARS.” Exhibit L.
- b. **June 15, 2024.** Dixon sent Manager a WhatsApp message, stating: “Tell lil Joey I got something he’s afraid of just when y’all thought he was untouchable.” He instructed Manager to “Tell your man this will end it all.” Exhibit M.

- c. **September 20, 2024.** Dixon posted a picture of Cartagena, Sean “Diddy” Combs, and DJ Khaled to his Instagram account, stating: “#fatjoe Nikki was underage when u flew her across state lines and out the country.” Exhibit N.
- d. **October 1, 2024.** Dixon posted to both his Instagram and Threads account, a post stating: “FAT JOE HAD A FULL FLEDGE RELATIONSHIP WITH NIKKI WHO WAS UNDERAGE” and “FAT JOE KNEW DRE WAS HAVING SEX WITH A UNDERAGE GIRL BECAUSE JOE WAS THE GUY TELLING HIM CALM DOWN WE GOING TO TAKE CARE OF IT.” Exhibit O.

44. On December 28, 2024, Dixon posted to his Instagram account, a post accompanying images of Cartagena with the following caption: “#FATJOE Milwaukee was scary the girl wasn’t lying” and “this happened in Wisconsin joe was being a thirsty n\*\*\*\*\* and almost got us locked up for #sexualassault.” The caption is accompanied by four headlines, “It’s Officially Over for Fat Joe,” “Fat Joe Investigated for Sexual Assault,” “Fat Joe’s Ghostwriter T.A. The Legend,” and “Fat Joe Former employee finally speaks out.” Exhibit P.

### **C. Dixon Falsely Alleges That Cartagena Cheated Him Out of Money and Credit**

45. Beyond the false allegations of pedophilia and sexual assault, Dixon also falsely claimed that Cartagena underpaid him for his services and did not credit him for songs he allegedly wrote for Cartagena.

46. For example, on March 17, 2025, Dixon published a “story” to his Instagram account accompanying the headline of a video titled “Fat Joe Calls Gongu Roach a Liar!” The story stated: “You have a very long history of stealing and robbing people” and “You stole from

Pun and his family you settled in court to pay Liaz Rios 2.3 million not counting the rest of the money you stole.” Exhibit Q.

47. On March 18, 2025, Dixon posted to his Instagram Threads account: “#FATJOE DONT NEVER FORGET WHO KEPT YOU BREATHING I WROTE THIS FOR YOUR HOMIE.” Exhibit R.

48. Dixon also published defamatory statements in an April 13, 2025 interview on the “Off da Books Podcast.” On the podcast, Dixon falsely alleged that Cartagena underpaid him for his services and did not credit him for songs he allegedly wrote for Cartagena. Exhibit S.

49. Dixon publicly published these statements on his social media accounts and in interviews knowing they were false. He plainly intended to humiliate and defame Cartagena, harm his reputation, and coerce him into paying Dixon millions of dollars that Cartagena did not owe.

#### **D. Dixon Falsely Made Heinous Posts About Cartagena and His Wife**

50. Dixon also attempted to pressure Cartagena by humiliating him and his wife. On January 22, 2024, Dixon asked Manager to “Tell Joe I’m going to live to talk about that 3 some his wife had sheese . . . . She’s a nasty scum bag u know that right your boss is a sucker.” Exhibit T.

51. In another Instagram post, Dixon tagged Cartagena’s wife and stated:

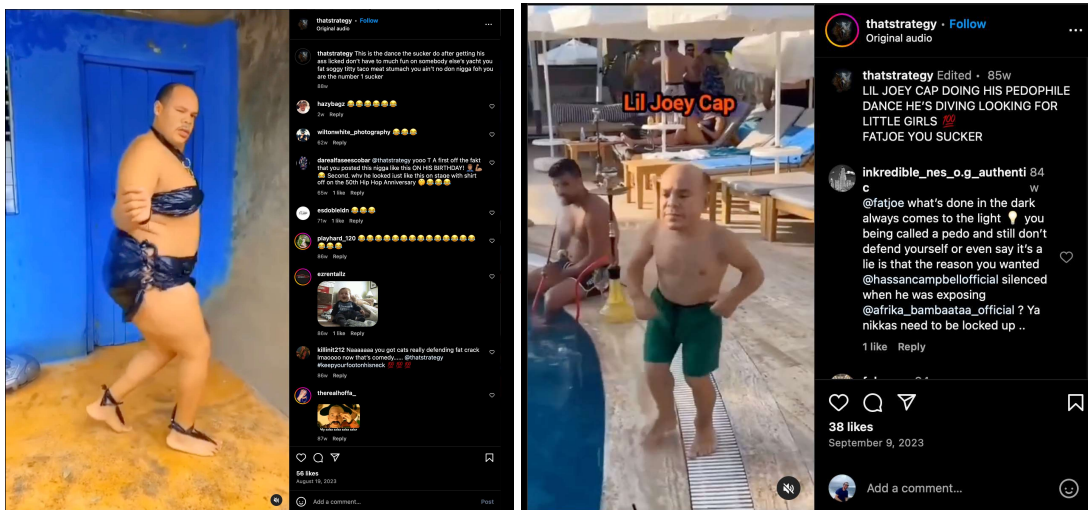
***YOU REALLY DON’T CARE THAT THIS SAFARI GRASS BAC  
3 INCH PINK SLIMY KING JERK CHICKEN 🦂 SPIDER 🦂  
PATH ASS WAS CHEATING ON YOU SO MUCH THAT  
NEVER EVEN GAVE IT A SHOT OF BEING FAITHFUL YOU  
DON’T CARE THAT HE LIVED IN THE WHORE HOUSES  
YOU DON’T CARE??? YOU KNOW WHAT I WITNESS HIM  
GETTING HIS ASS EATEN THAT NIGGA IS OUT OF  
CONTROL 🦂 I GOT SOMETHING SPECIAL DO YOU WANT  
IT***

Exhibit U.

52. Dixon even tagged Cartagena in a post and stated: “**@FATJOE SHOULD I BLAST ONE NAME OFF THAT YOUR WIFE CHEATED ON YOU WITH OR SHOULD I WAIT TO GO INTO FULL DETAIL 🏹 IT WILL HURT YOU SHEESE SHES A BEAST.**”

Exhibit V.

53. Dixon made countless other posts attempting to belittle and humiliate Cartagena. Many of these posts superimpose Cartagena’s head on another person’s body:



### III. Dixon Hired Blackburn to Continue His Extortionate Scheme

54. Frustrated by his inability to overcome Cartagena’s resolve, Dixon upped the ante by hiring Blackburn and Blackburn Law to shake Cartagena down. But Blackburn is no ordinary lawyer. He is an extortionist masquerading as a lawyer in a cynical ruse to use the court system as both a sword and a shield for his unethical conduct.

55. Blackburn’s gambit has not gone unnoticed. Just over a year ago, in April 2024, Judge Cote stated that:

A reasonable inference from Blackburn’s pattern of behavior is that he improperly files cases in federal court to garner media attention, embarrass defendants with salacious allegations, and pressure

defendants to settle quickly. Indeed, his submissions to this Court have been rife with disturbing allegations against the defendants and defense counsel. Blackburn has called defense counsel in this action a ‘disgusting racist’ for rejecting his preferred mediators. In response to this Court's Order requiring plaintiff to submit an affidavit ‘regarding the representation made by the plaintiff to counsel regarding Fisher’s residence,’ Blackburn filed a wholly inappropriate 53-paragraph affidavit containing multiple irrelevant and scandalous accusations against Fisher.

*Zunzurovski v. Fisher*, No. 23-cv-10881, 2024 U.S. Dist. LEXIS 62568, at \*14 (S.D.N.Y. Apr. 3, 2024).

56. And less than a month ago, Judge Oetken issued a “warning” to Blackburn. *Combs*, No. 24-cv-1457, U.S. Dist. LEXIS 54277. Judge Oetken first stated that Blackburn filed “admittedly false claims.” Then, after reviewing Blackburn’s filings, Judge Oetken concluded that they are “replete with inaccurate statements of law, conclusory accusations, and inappropriate ad hominem attacks on opposing counsel.”

57. Blackburn also appears to be suffering from a personal crisis. An Investigation Report of the East Orange Police Department provides that, on April 17, 2024, Blackburn’s girlfriend’s best friend alleged that Blackburn was harassing her. Exhibit W. According to the report, the best friend stated that Blackburn “called her a ‘bitch’ numerous times, texted her, ‘I hope your mother has a life insurance policy because you are worth more dead than alive,’ and made various statements to her that she claimed were false.” The report states that the best friend “is in fear of her safety because she does not know what Mr. Blackburn is capable of.”

58. Blackburn’s conduct regarding Cartagena appears to be more of the same. He has demonstrated a pattern of unprofessional and erratic behavior that raises significant concerns. Blackburn has repeatedly referenced unrelated cases involving other clients, often in an attempt to intimidate or distract from the issues at hand. In several communications, Blackburn has engaged in name-dropping celebrities seemingly to bolster his own credibility and to exert undue pressure

on Cartagena. Most troubling, however, are the numerous emails sent well after business hours, which are characterized by a bizarre, stream-of-consciousness style and contain vague, threatening language. Following the unsuccessful shakedown by way of the March 23, 2025 letter seeking compensation for songwriting and performing, on April 21, 2025, Blackburn sent a second letter reasserting Dixon's demands for payment (the "Second Letter"). This time, however, Blackburn added outrageous, false allegations of misconduct, including purported violations of the Trafficking Victims Protection Act for alleged acts of forced labor and coercive sex trafficking.

59. As a plain indication of its lack of merit, the Second Letter lacked any specific allegations of purported wrongdoing, failing to specify a single instance in which Cartagena allegedly compelled Dixon to continue working for him or engage in a sex act.

60. Despite Dixon's claims lacking any basis, Blackburn threatened to immediately file an already drafted complaint premised on Dixon's false allegations of forced labor and sex trafficking if Cartagena did not accede to Dixon's demands by April 25, 2025. This demand gave Cartagena a four-day window before Dixon would go public with his false allegations.

61. On April 22, 2025, Blackburn sent an email to Cartagena's counsel bizarrely threatening to "report [Cartagena] to Homeland Security and file suit without further warning." He also claimed that he had video and other evidence to back up Dixon's claims.

62. On April 23, 2025, Cartagena's counsel spoke to Blackburn to discuss Dixon's allegations and to ascertain why Blackburn threatened to call Homeland Security.

63. Cartagena's counsel also asked Blackburn for the video "evidence" of Dixon's claim, but Blackburn admitted he had never seen some of the video evidence he claims substantiates his client's allegations.

64. Further, Blackburn threatened to submit a sworn statement by one of Cartagena's former managers to "corroborate" the claims against Cartagena.

65. On April 25, 2025, Blackburn sent Cartagena's counsel a third letter containing even more vile and false allegations against Cartagena and demanding that Cartagena pay Dixon a settlement payment of \$20,000,000 to release Cartagena from Dixon's bogus claims (the "Third Letter") – multiples higher than his previous \$2.6 million demand. The Third Letter again threatened that Dixon would "initiate litigation immediately" if Cartagena failed to accede to Dixon's demands that same day, and would also drag in one of his business partners, Market America.

66. Blackburn's baseless threats were then repeated in a flurry of unhinged emails sent long after the close of business.

- **April 26, 2025 at 9:52 PM.** Stating that he was going to sue a business affiliated with Cartagena along with the business's owners.
- **April 27, 2025 at 11:36 PM.** Refusing to provide names of individuals Blackburn claims were making allegations against Cartagena.
- **April 28, 2025 at 11:01 PM.** Refusing to provide evidence and baselessly claiming that Cartagena's counsel was "conflicted."
- **April 29, 2025 at 12:15 AM.** "Playtime is over."

67. Blackburn repeated his heinous and false allegations against Cartagena on a call with Cartagena's lawyer on April 28, 2025, during which he stated that he personally verified the alleged claims and spoke with certain critical witnesses, including one of the alleged minors, and that his \$20 million demand was based on other cases which bore little resemblance to the facts herein. For example, to inflate his demand, Blackburn referenced how former-National League



Football star Shannon Sharpe's attempt to settle a case for \$10 million was turned down. In fact, Blackburn warned: "Tony Buzbee has been, he just, he just filed against Shannon Sharpe last week. And like Shannon Sharp's right, career is damned near over now because of that, with that, with that woman who was 19 years old and and a model on only fans or whatever it is, right? And you know, he and Shannon Sharpe offered \$10 million in mediation, you know, to get rid of it. You know, to try to resolve it. And Tony Buzbee still filed, did not care. You know what it \$50 million for, for a clearly consensual adult relationship. And you know, like, like Shannon Sharpe, got kicked off of ESPN, he lost everything." On the call, Blackburn also stated that he emailed Cartagena's lawyer a completely irrelevant audio recording without Dixon's permission.

68. And Blackburn followed up on his third letter and call with Cartagena's counsel with yet another email to Cartagena's counsel, this time threatening to bring a RICO claim against Cartagena supposedly concerning claims that have nothing to do with Dixon's and Cartagena's relationship or the allegations in Cartagena's demand letters. Adding insult to injury, when Blackburn last brought a RICO claim, Judge Oetken was flabbergasted that Blackburn argued that the defendants were "presumed guilty of being a RICO criminal organization" because they were subject to a Grand Jury Indictment. *Jones v. Combs*, No. 24-cv-1457, 2025 U.S. Dist. LEXIS 54277, at \*10 (S.D.N.Y. Mar. 24, 2025). Judge Oetken observed: "That any licensed member of the bar would espouse such an absurd understanding of the law is not just disturbing, but shocking."

69. Blackburn's and Dixon's claims regarding Cartagena — both public and in the foregoing correspondence and calls — are false, and both Dixon and Blackburn knew those claims to be false when made.

70. Dixon's and Blackburn's unrelenting efforts to humiliate and threaten Cartagena into an extortionate settlement agreement to avoid the painstaking efforts of publicly dispelling Dixon's lies have compelled Cartagena to file this Complaint.

### **FIRST CAUSE OF ACTION FOR DEFAMATION**

#### **(Against Dixon)**

71. Cartagena incorporates by reference each allegation set forth above.

72. Dixon has made false statements on his public social media platforms falsely accusing Cartagena of vile sexual misconduct, pedophilia, statutory rape, violence and stealing, including posting on his Instagram account, @thatstrategy:

- On May 23, 2024, Dixon posted to his Instagram account, a post, directed at Cartagena which Dixon notoriously refers to as "Lil Joey," stating: "LIL JOEY WAS DATING AND HAVING SEX WITH A 16 YEAR OLD GIRL NAMED NIKKI AKA CHIQUITA HE HAD A FULL FLEDGE RELATIONSHIP WITH HER FOR 5 YEARS."
- On September 20, 2024, Dixon posted to his Instagram account, a post accompanying a picture of Cartagena, Sean "Diddy" Combs, and DJ Khaled stating: "#fatjoe Nikki was underage when u flew her across state lines and out the country."
- On October 1, 2024, Dixon posted to his Instagram account, a post stating: "FAT JOE HAD A FULL FLEDGE RELATIONSHIP WITH NIKKI WHO WAS UNDERAGE" and "FAT JOE KNEW DRE WAS HAVING SEX WITH A UNDERAGE GIRL BECAUSE JOE WAS THE GUY TELLING HIM CALM DOWN WE GOING TO TAKE CARE OF IT."
- On October 1, 2024, Dixon posted to his Instagram Threads account: "FAT JOE HAD A FULL FLEDGE RELATIONSHIP WITH NIKKI WHO WAS UNDERAGE" and "FAT JOE KNEW DRE WAS HAVING SEX WITH A UNDERAGE GIRL BECAUSE JOE WAS THE GUY TELLING HIM CALM DOWN WE GOING TO TAKE CARE OF IT."
- On December 28, 2024, Dixon posted to his Instagram account, a post accompanying images of Cartagena with the following caption: "#FATJOE Milwaukee was scary the girl wasn't lying" and "this happened in Wisconsin joe was being a thirsty n\*\*\*\* and almost got us locked up for #sexualassault." The caption is accompanied by four headlines, "It's Officially Over for Fat Joe," "Fat Joe Investigated for Sexual Assault"

“Fat Joe’s Ghostwriter T.A. The Legend,” and “Fat Joe Former employee finally speaks out.”

- On December 28, 2024, Dixon posted to his Instagram account, a post of an interview he did in which he made false statements accusing Cartagena of sexually assaulting a woman in Wisconsin by placing his hand up her skirt.
- On March 17, 2025, Dixon published to his Instagram account, accompanying the headline of a video title “Fat Joe Calls Gongu Roach a Liar!” an Instagram story stating: “You have a very long history of stealing and robbing people” and “You stole from Pun and his family you settled in court to pay Liaz Rios 2.3 million not counting the rest of the money you stole.”
- On March 18, 2025, Dixon posted to his Instagram Threads account, a post accompanying an image of Cartagena’s album cover “Jealous Ones Still Enny” stating: “#FATJOE DONT NEVER FORGET WHO KEPT YOU BREATHING I WROTE THIS FOR YOUR HOMIE.”
- On April 13, 2025, Dixon did an interview on “Off da Books Podcast” and falsely alleged that Cartagena underpaid him for his services and did not credit him for songs he allegedly wrote for Cartagena.

73. Dixon intentionally published these false statements to his publicly accessible social media accounts, which third parties viewed and commented on.

74. Dixon had neither privilege nor authorization to publish such false statements to third parties.

75. Dixon’s statements also constitute defamation per se:

- a. Dixon intentionally made false statements charging Cartagena with the serious crimes of sexual assault and statutory rape;
- b. Such accusations of crimes of moral turpitude tend to injure a person’s trade, business and profession;
- c. Dixon published his false statements to third parties on his public social media accounts and in publicly available interviews; and

- d. Dixon's false statements and actions were intended to harm Cartagena's reputation and caused emotional distress.

76. Based on this conduct, Cartagena is entitled to (i) injunctive relief restraining Dixon from defaming Cartagena; (ii) an award of damages in an amount to be proven at trial, but in no event less than \$15,000,000, plus interest; (iii) an award of exemplary damages; and (iv) an award of attorney's fees, costs and expenses.

**SECOND CAUSE OF ACTION FOR  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

***(Against Dixon, Blackburn and Blackburn Law)***

77. Cartagena incorporates by reference each allegation set forth above.

78. Since 2023, Dixon intentionally initiated a campaign of public harassment and falsehoods against Cartagena to cause professional and emotional harm by publishing various social media posts falsely accusing Cartagena of vile crimes of sexual assault, statutory rape, violence, and stealing:

- On August 31, 2023, Dixon posted to his Instagram account about Cartagena, whom Dixon occasionally calls "Lil Joey," stating "lil joey doing his pedophile dance when he bags another 16 year old."
- On September 9, 2023, Dixon posted to his Instagram account: "LIL JOEY CAP DOING HIS PEDOPHILE DANCE HE'S DIVING LOOKING FOR LITTLE GIRLS 🍆."
- On September 13, 2023, Dixon posted to his Instagram account: "@FATJOE YOU ASK ME DO I TAKE ANY ACCOUNTABILITY YES I DO FOR WATCHING YOU MESS WITH UNDER AGE GIRLS BUT I WAS MINDING MY BUSINESS," "STOP MOVING AROUND IN THE STREETS LIKE YOU WASN'T MESSING WITH A UNDER AGE GIRL" and "YOU'RE A PEDOPHILE."
- On May 23, 2024, Dixon posted to his Instagram account, a post, directed at Cartagena which Dixon notoriously refers to as "Lil Joey" stating: "LIL JOEY WAS DATING AND HAVING SEX WITH A 16 YEAR OLD GIRL NAMED NIKKI AKA CHIQUITA HE HAD A FULL FLEDGE RELATIONSHIP WITH HER FOR 5 YEARS."

- On September 20, 2024, Dixon posted to his Instagram account, a post accompanying a picture of Cartagena, Sean “Diddy” Combs, and DJ Khaled stating: “#fatjoe Nikki was underage when u flew her across state lines and out the country.”
- On October 1, 2024, Dixon posted to his Instagram account, a post stating: “FAT JOE HAD A FULL FLEDGE RELATIONSHIP WITH NIKKI WHO WAS UNDERAGE” and “FAT JOE KNEW DRE WAS HAVING SEX WITH A UNDERAGE GIRL BECAUSE JOE WAS THE GUY TELLING HIM CALM DOWN WE GOING TO TAKE CARE OF IT.”
- On October 1, 2024, Dixon posted to his Instagram Threads account: “FAT JOE HAD A FULL FLEDGE RELATIONSHIP WITH NIKKI WHO WAS UNDERAGE” and “FAT JOE KNEW DRE WAS HAVING SEX WITH A UNDERAGE GIRL BECAUSE JOE WAS THE GUY TELLING HIM CALM DOWN WE GOING TO TAKE CARE OF IT.”
- On December 28, 2024, Dixon posted to his Instagram account, a post accompanying images of Cartagena with the following caption: “#FATJOE Milwaukee was scary the girl wasn’t lying” and “this happened in Wisconsin joe was being a thirsty n\*\*\*\* and almost got us locked up for #sexualassault.” The caption is accompanied by four headlines, “It’s Officially Over for Fat Joe,” “Fat Joe Investigated for Sexual Assault” “Fat Joe’s Ghostwriter T.A. The Legend,” and “Fat Joe Former employee finally speaks out.”
- On December 28, 2024, Dixon posted to his Instagram account, a post of an interview he did in which he made false statements accusing Cartagena of sexually assaulting a woman in Wisconsin by placing his hand up her skirt.
- On March 17, 2025, Dixon published to his Instagram account, accompanying the headline of a video title “Fat Joe Calls Gongu Roach a Liar!” an Instagram story stating: “You have a very long history of stealing and robbing people” and “You stole from Pun and his family you settled in court to pay Liaz Rios 2.3 million not counting the rest of the money you stole.”
- On March 18, 2025, Dixon posted to his Instagram Threads account, a post accompanying an image of Cartagena’s album cover “Jealous Ones Still Enny” stating: “#FATJOE DONT NEVER FORGET WHO KEPT YOU BREATHING I WROTE THIS FOR YOUR HOMIE.”
- On April 13, 2025, Dixon did an interview on “Off da Books Podcast” and falsely alleged that Cartagena underpaid him for his services and did not credit him for songs he allegedly wrote for Cartagena.

79. Dixon escalated his campaign of harassment by sending Cartagena extortionate demand letters through his attorney, Blackburn, threatening to initiate frivolous lawsuits with false accusations of statutory rape, forced labor and coercive sex trafficking.

80. On March 23, 2025, Blackburn sent Cartagena a baseless demand letter alleging that Cartagena underpaid Dixon and denied him credit for his contributions to Cartagena's success under their oral agreement, and demanding retroactive songwriting credit and monetary settlement.

81. When Cartagena refused to succumb to Dixon's extortionate demand letters, Blackburn sent a second letter on April 21, 2025, demanding payment for alleged withheld payments and credit. Dixon further included false allegations of vile conduct by Cartagena, including purported sex with minors, violations of the Trafficking Victims Protect Act for alleged acts of forced labor and coercive sex trafficking, and threatened to file a lawsuit alleging the same if Cartagena failed to accede to Dixon's demands within four days of receipt of the demand.

82. On April 22, 2025, Blackburn emailed Cartagena's counsel bizarrely threatening to "report [Cartagena] to Homeland Security and file suit without further warning." He also claimed that there was video and other evidence to support Dixon's claims.

83. The next day, Cartagena's counsel spoke to Blackburn to discuss Dixon's allegations against Cartagena and ascertain Blackburn's grounds for threatening to call Homeland Security on Cartagena. Despite Cartagena's counsel requesting information during the call, including the last names of the individuals Blackburn claims he personally spoke with to "corroborate" Dixon's claims, Blackburn was unable to answer such requests.

84. Blackburn further admitted that he has never seen some of the videos he claims support the allegations against Cartagena and threatened to submit a sworn statement by one of Cartagena's former managers to "corroborate" the claims against Cartagena.

85. After attorneys for the parties corresponded on April 25, 2025, Blackburn sent a third demand letter with more vile false accusations against Cartagena demanding settlement payment of \$20,000,000 to release Cartagena from Dixon's baseless claims, or the initiation of immediate litigation if Cartagena failed to accede to such demands that day. He also threatened to name Cartagena's marketing partner, Market America, in the baseless lawsuit in a further attempt to harm Cartagena's business interests and reputation.

86. The heinous and false allegations were repeated in a call with Blackburn on April 28, 2025, during which he admitted to relying on his client as the basis for certain of the otherwise independently verifiable (and false) claims, and that his \$20 million demand was based on other cases which bore little resemblance to the facts herein.

87. Dixon published such false statements, publicly and in his extortionate demand letters, negligently, with knowledge of the falsity of the statements, malice, and/or with reckless disregard of the truth.

88. Dixon's publication of false and vile accusations against Cartagena was intentional and/or reckless and constitutes extreme and outrageous conduct.

89. Blackburn's threats to call Homeland Security against Cartagena and threats of initiating a lawsuit with baseless claims were intentional and constitute extreme and outrageous conduct.

90. Blackburn also falsely stated to Cartagena's counsel that he personally verified all allegations and had spoken with certain critical witnesses, including one of the alleged minors, who deny that they have spoken to Blackburn

91. Defendants' attempt to extort Cartagena by asserting false and vile accusations and threatening the initiation of a lawsuit was intentional and/or reckless and constitutes extreme and outrageous conduct.

92. Defendants' publication of false statements and threats of litigation alleging false, vile misconduct has caused Cartagena severe emotional distress. As a result of Defendants' actions, Cartagena also suffered substantial losses and sustained significant unreimbursed costs in an amount to be proven at trial, but in no event less than \$15,000,000, plus interest. He will suffer additional significant special damages, including loss of business opportunities, harm to his professional reputation, and financial setbacks, once Dixon's and Blackburn's allegations become public.

93. Based on this conduct, Cartagena is entitled to (i) injunctive relief restraining Defendants from engaging in further conduct of the type alleged herein; (ii) an award of damages to be proven at trial; (iii) an award of exemplary damages; and (iv) an award of attorney's fees, costs and expenses.

#### **Prayer for Relief**

**Wherefore**, Cartagena respectfully prays for judgment and relief against Terrance Dixon (as to both Counts) and Tyronne Blackburn and T.A. Blackburn Law, PLLC (on Count II) as follows:



- A. Damages in an amount to be proved at trial but not less than \$15,000,000, plus interest;
- B. Entering a preliminary and permanent injunction restraining Defendants from engaging in further conduct of the type alleged herein;
- C. An award of exemplary damages;
- D. An award of attorneys' fees, costs and expenses; and
- E. Such other and further relief as this Court may deem just, equitable and proper.

**Demand for Jury Trial**

Cartagena demands a trial by jury for all issues so triable.

Dated: April 29, 2025  
New York, New York

**/s/ Joseph Tacopina**

Joseph Tacopina

Chad Seigel

**Tacopina Seigel & DeOreo**

275 Madison Avenue, 35<sup>th</sup> Floor

New York, New York 10016

212-227-8877

[jtacopina@tacopinalaw.com](mailto:jtacopina@tacopinalaw.com)

[cseigel@tacopinalaw.com](mailto:cseigel@tacopinalaw.com)

**Of Counsel:**

Jordan W. Siev

**Reed Smith LLP**

599 Lexington Avenue, 22<sup>nd</sup> Floor

New York, New York 10022

212-205-6087

[jsiev@reedsmith.com](mailto:jsiev@reedsmith.com)